

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

No. 2:15-cr-04268-JB

ANGEL DELEON, et al.

Defendants.

**NOTICE OF LODGING OF THE
SUPPLEMENT OF EXHIBITS TO ANTHONY RAY BACA'S
MOTION TO COMPEL IMMEDIATE PRODUCTION
OF *BRADY* AND *GIGLIO* MATERIALS**

Defendant Anthony Ray Baca, joined by Chris Chavez, Rudy Perez, Joe Gallegos, Chris Garcia, Shauna Gutierrez, Edward Troup, Carlos Herrera, Billy Garcia, Andrew Gallegos, and Arturo Garica, respectfully tenders this supplement of Exhibits to the Motion to Compel Immediate Production of *Brady* and *Giglio* Materials, Doc. 1332. The following Exhibits are attached that are referenced in the Motion, and filed by hand since the audio files could not be filed electronically:

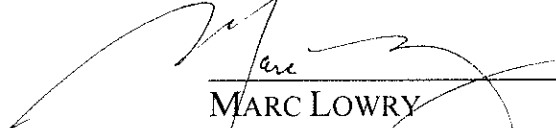
Exhibit A: The March 25, 2016 Disclosure of the September 10, 2015 cellular telephone call between Eric Duran and FBI Special Agent Byran Acee, DVD 6, CHS Ironman, file 5052181861 2015-09-10 15-09-26 00488-001.mp3

Exhibit B: Eric Duran's Commissary Account Spreadsheet

Exhibit C: The June 19, 2017 Disclosure of the July 15, 2016 jailhouse call between Eric Duran and Special Agent Byran Acee, DVD 26, file 10.92.0.21-f0768f500a5c00156a2361b04a503032.mp3

Respectfully submitted,

ROTHSTEIN, DONATELLI LLP



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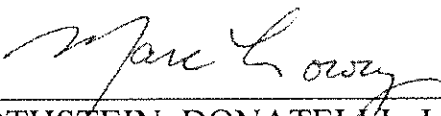
DUNCAN EARNEST, LLC

/s/ Theresa M. Duncan
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Attorneys for Anthony Ray Baca

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 17th day of October, 2017, I filed the foregoing pleading electronically through the CM/ECF system, which caused counsel for Plaintiffs and Defendants to be served by electronic means, as more fully reflected on the Notice of Electronic Filing.



ROTHSTEIN, DONATELLI, LLP

ROTHSTEIN DONATELLI LLP

ATTORNEYS AT LAW

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October 17, 2017

Via Hand Delivery

Honorable James O. Browning
United States District Court
District of New Mexico
333 Lomas NW, Ste. 660
Albuquerque, NM 87102

RE: *United States of America v. Angel DeLeon, et al.*
Cause No. 2:15-CR-04268-JB

Dear Judge Browning:

The following exhibits are being lodged with the Court as a Supplement to Defendant Anthony Ray Baca's *Motion to Compel Immediate Production of Brady and Giglio Materials* [Doc. 1332]. The attached *Notice of Lodging of the Supplement of Exhibits* together with a CD containing the exhibits and audio files that could not be filed electronically are included. A copy of this CD is similarly being provided to the United States.

Thank you for your time and consideration in this regard.

Most respectfully submitted,

ROTHSTEIN DONATELLI LLP



Marc M. Lowry
Attorney for Anthony Ray Baca

MML:ps

Attachments: *as indicated*

cc: Maria Ysabel Armijo, Asst. U.S. Attorney
Randy M. Castellano, Asst. U.S. Attorney
All defense counsel